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 MARTIN A. PEREZ

IN THE UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

MARTIN PEREZ,)	Case No. 3:14-cv-03908-SC
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	EXTEND DEADLINE BY WHICH TO
vs.)	COMPLETE ADR/MEDIATION
)	
HBC RADIOMATIC GmbH; HBC)	
RADIOMATIC, INC., and DOES 1 to 20,)	Complaint Filed: June 27, 2014
inclusive,)	
)	[The Hon. Samuel Conti]
Defendant.)	
_____)	

Pursuant to U.S. District Court ADR Local Rule 6-5 and U.S. District Court Local Rule 7-12, the parties through counsel stipulate and request that the ADR deadline in this matter be extended from May 19, 2015, to August 17, 2015. Thus, Plaintiff, MARTIN PEREZ, and Defendants, HBC RADIOMATIC GmbH, and HBC RADIOMATIC, INC., hereby enter into this Stipulation and request the Order based on the following facts:

1. On February 10, 2015, counsel held a pre-mediation telephone conference with mediator, John F. Barg. May 19, 2015, is currently the deadline for us to hold an ADR session with Mr. Barg.

2. Counsel for the parties have met and conferred on this matter and agree that the best possible chance to resolve this matter at a robust mediation will be once the first round of written discovery, and key witness depositions, have been completed.

3. Initial disclosures pursuant to FRCP 26 have been completed.

4. On February 12, 2015, Plaintiff served written discovery upon Defendants. Those responses are currently due on April 15, 2015, due to an agreed extension of time to respond.

5. On March 27, 2015, Defendants served written discovery upon Plaintiff. Those responses are due on April 29, 2015.

6. On March 27, 2015, Defendants issued a subpoena to produce documents upon Plaintiff's employer. Those documents are due to be produced on April 30, 2015.

7. On April 9, 2015, counsel will participate in a further pre-mediation conference call with Mr. Barg.

8. The parties are set for further Case Management Conference before this Court on May 1, 2015.

9. The parties require sufficient time to evaluate discovery responses, perform all necessary follow-up, and have the option of taking necessary depositions, before conducting mediation. Further, one of the Defendants is a foreign entity, and the other Defendant is an out-of-state entity, so the need to have the facts as fully developed as possible before we have a mediation date at which personal presence is required is particularly acute.

10. For the foregoing reasons the parties through counsel, respectfully request that the mediation deadline be extended from May 19, 2015 to August 17, 2015.

IT IS SO STIPULATED.

VIOLA LAW FIRM, P.C.

Dated: April 8, 2015

By: /s/ Peter W. Daniel
Peter W. Daniel, Esq.
Attorneys for Plaintiff, MARTIN A. PEREZ
REED SMITH, LLP

Dated: April 8, 2015

By: /s/ Lynn A. Combs
Lynn A. Combs, Esq.
Attorneys for Defendants, HBC RADIOMATIC
GmbH, and HBC RADIOMATIC, INC.

ORDER

PURSUANT TO THE FOREGOING STIPULATION, AND GOOD CAUSE APPEARING, IT
IS ORDERED that the deadline by which to conduct Mediation is extended from May 19, 2015, to
August 17, 2015.

Dated: April 9, 2015

By:


The Hon. Samuel Conti-Judge Courtroom 1
U.S. District Court-Northern District of California